JAMES E. NEUMAN, P.C.

Attorney at Law 100 Lafayette Street – Suite 501 New York, New York 10013

APPLICATION GRANTED. In light of the agreement of Pretrial Services and the U.S. Attorney's Office, and based on the Court's understanding that Mr. Delossantos Minaya's current job does not involve the type of "long haul" trucking that he previously performed (as discussed at the bail/detention hearing), Mr. Delossantos Minaya's bail conditions are modified to allow the curfew to be adjusted at the discretion of Pretrial Services, and to expand his areas of travel to include Rhode Island, Massachusetts, and New Jersey for work purposes only. Contrary to counsel's representation, the District of Columbia was NOT an approved travel location at the time bail conditions were originally set, and no application has been made here for travel to the District of Columbia for work.

Dated: October 6, 2021

BY ECF

Hon. Andrew E. Krause United States Magistrate Judge United States Courthouse 40 Foley Square New York, NY 10007 SO ORDERED.

ANDREW E. KRAUSE United States Magistrate Judge

Re: United States v Eddie Junior Delossantos Minaya, 7:21-mj-08520

Your Honor:

I represent Eddie Junior Delossantos Minaya in the referenced case and write to request a modification of the conditions of his release. On August 31, 2021, Mr. Delossantos Minaya was released on a bond. One of the conditions specified a curfew, restricting him to his residence from 7 p.m. to 7 a.m. Another condition restricted his travel to Connecticut, the District of Columbia, and the Southern and Eastern Districts of New York. The assumption at the time was that such hours and travel restrictions would enable him to continue working his job as a truck driver. Since then, it has become apparent that additional flexibility is needed for him to maintain employment. In addition to the areas mentioned above, his employer has informed me that he occasionally needs to make deliveries to Rhode Island, Massachusets and New Jersey, and that sometimes he will need to be out later than 7 p.m.

Accordingly, we ask that this Court modify the conditions of release by (1) expanding the areas of travel to Rhode Island, Massachusets and New Jersey; and (2) providing that Mr. Delossantos Minaya must abide by a curfew according to hours set at the discretion of the Probation Office. This suggestion is made at the suggestion of Mr. Delossantos Minaya's supervising probation officer, and with the consent of the government.

Respectfully submitted,

s/s James E. Neuman